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13	Attorneys for X Corp.,									
14	successor in interest to Defendant Twitter, Inc.									
15										
16	UNITED STATES DISTRICT COURT									
17	NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION									
18	United States of America,	Case No. 3:22-cv-3070-TSH								
19	Plaintiff,	DECLARATION OF RENATO LEITE								
20	VS.	MONTEIRO IN SUPPORT OF X CORP.'S ADMINISTRATIVE MOTION TO SEAL								
21										
22	Twitter, Inc.,	The Hon. Thomas S. Hixson								
23	Defendant.									
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		-1- Case No. 3:22-cv-3070-TSH								
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MONTEIRO DECLARATION ISO X CORP.'S ADMINISTRATIVE MOTION TO SEAL

DECLARATION OF RENATO MONTEIRO

I, Renato Leite Monteiro, declare as follows:

1. I am the Global Head of Privacy, Global Data Protection Officer, and Senior Legal Director for X Corp., successor in interest to Defendant Twitter, Inc. I make this declaration based on personal knowledge and, if called as a witness, I could and would testify competently to the matters set forth herein. I make this declaration in support of X Corp.'s Administrative Motion to File Under Seal Certain Documents The United States Filed in Support of Its Opposition to X Corp.'s Motion for Protective Order and Relief from Consent Order (the "Administrative Motion").

2. I understand that, by the Administrative Motion, X Corp. seeks to keep under seal certain attachments that the United States submitted in support of its Opposition to X Corp.'s Motion for Protective Order and Relief from Consent Order, including excepts of the transcripts of depositions of several former high-ranking privacy and information security personnel—including Director of Threat Management Seth Wilson, Director of Security Engineering Andy Sayler, Chief Privacy Officer and Deputy General Counsel Damien Kieran, and Chief Information Security Officer Lea Kissner—as well as a resignation email sent by Mx. Kissner.

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1	3. I am fai
2	by virtue of my positi
3	information about X C
4	that X Corp. keeps cor
5	confidential for a nun
6	insight into how the co
7	or penetrations, and (2
8	learning information
9	competitors.
10	I declare under
11	foregoing is true and c
12	DATED: 12/07/2023
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3. I am familiar with the work these individuals performed and the roles they fulfilled							
by virtue of my position at X Corp. I am aware that their positions regularly exposed them to							
information about X Corp.'s privacy and security technology, processes, policies, and procedures							
that X Corp. keeps confidential in the normal course of business. X Corp. keeps such information							
confidential for a number of reasons, including in order to (1) prevent bad actors from gaining							
insight into how the company's systems operate, which could be used to identify potential exploits							
or penetrations, and (2) prevent competitor businesses from gaining a competitive advantage by							
learning information about X Corp.'s systems and procedures that X Corp. lacks about its							
competitors.							
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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

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Renato Leite Monteiro